

Exhibit 19



U.S. Department of Justice

Bureau of Alcohol, Tobacco,
Firearms and Explosives

Tampa Field Division

Tampa, Florida 33602-3945
www.atf.gov

November 15, 2021

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Mr. Kevin Maxwell
Rare Breed Trigger, LLC
255 Primera Blvd, Ste 160
Lake Mary, FL 32746

Dear Mr. Maxwell:

As you are aware, the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) has previously examined the Rare Breed Trigger, model FRT-15, and determined it to be a machinegun as defined in the National Firearms Act (NFA).

The NFA defines a firearm to include, in relevant part, "a machinegun." 26 U.S.C. § 5845(a)(6). A machinegun is defined under section 5845(b) as

Any weapon which shoots, is designed to shoot, or can be readily restored to shoot, automatically more than one shot, without manual reloading, by a single function of the trigger. The term shall also include the frame or receiver of any such weapon, any part designed and intended solely and exclusively, or combination of parts designed and intended, for use in converting a weapon into a machinegun, and any combination of parts from which a machinegun can be assembled if such parts are in the possession or under the control of a person.

Emphasis added.

As the Rare Breed Triggers FRT-15 is a machinegun under the NFA, it is subject to the registration, transfer, taxation, and possession restrictions applicable to these regulated weapons, which include criminal penalties relating to the illegal transfer and possession of said weapons. *See* 26 U.S.C., Chapter 53; *see also* 26 U.S.C. § 5871 (any person who violates or fails to comply with the provisions of the NFA shall be fined \$10,000 per violation and is subject to imprisonment for a term of up to ten years). Additionally, machineguns are also subject to the Gun Control Act of 1968, as amended (GCA), *see* 18 U.S.C. § 921(a)(23), and are subject to prohibitions regarding the possession, transfer, and transport of such items as set forth in 18 U.S.C. § 922(o).

ATF has concluded the Rare Breed Triggers, model FRT-15, is a combination of parts designed and intended for use in converting a weapon into a machinegun, hence, the FRT-15 has been classified as a "machinegun" as defined by the NFA and GCA. ATF's examination found the Rare Breed Triggers, model FRT-15, allows a firearm to expel more than one shot, without manual reloading, with a single, continuous pull of the trigger.

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In response to your letter dated November 2, 2021, I have forwarded your correspondence to ATF's Firearms and Ammunition Technology Division (FATD).

On July 26, 2021, ATF served you with a Cease and Desist Letter that remains in effect. As that letter noted, any continued manufacture or transfer of Rare Breed Trigger FRT-15s beyond that date may result in (1) law enforcement action by ATF, including a referral of this matter to the United States Attorney's Office for criminal prosecution; (2) tax assessment and collection; and/or (3) seizure and forfeiture of the firearms and property involved in violations of Federal law.

If you have any questions, and to discuss the plan referenced above, please contact Special Agent in Charge, Tampa Field Division, Craig Saier at 813-202-7300.

A handwritten signature in black ink, appearing to read 'Craig Saier', with a horizontal line extending to the right.

Craig Saier
Special Agent in Charge
Tampa Field Division